

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

LOUIS JONES,)
Plaintiff,) Case No. 4:22-cv-00138
v.)
NMC METALS, INC.,) JUDGE BENITA Y. PEARSON
Defendant.)

JOINT MOTION TO APPROVE STIPULATED PROTECTIVE ORDER

The parties, through their undersigned counsel, have jointly agreed to the terms of the attached Stipulated Protective Order pursuant to Fed. R. Civ. P. 26(c), and hereby move this Court to approve and adopt the same.

Respectfully Submitted,

/s/ David N. Truman
David N. Truman (0082347)
david@employmentlawpartners.com
Stuart G. Torch (0079667)
stuart@employmentlawpartners.com
Employment Law Partners, LLC
4700 Rockside Road, Suite 530
Independence, Ohio 44131
Telephone: 216-382-2500
Facsimile: 216-381-0250

Attorneys for Plaintiff

s/ Matthew M. Ries

Kevin P. Murphy, #0029747
Matthew M. Ries, #0083736
HARRINGTON, HOPPE & MITCHELL,
LTD.
108 Main Avenue, S.W., Suite 500
Warren, OH 44481
Tel. 330-392-1541
Fax 330-394-6890
Email: KMurphy@hhmlaw.com;
MRies@hhmlaw.com

Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that on July 11, 2022, a true copy of the foregoing motion was served on all counsel of record via CM/ECF.

/s/ David N. Truman
One of the attorneys for Plaintiff